

IN THE UNITED STATE DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

IN RE BARD IVC FILTERS
PRODUCTS LIABILITY LITIGATION

No: 2:15-MD-02641-DGC

This Document Relates to Plaintiff(s):

CARRIE KELLEY

Civil Case # 2:17-CV-01931-DGC

UNOPPOSED MOTION FOR LEAVE TO AMEND COMPLAINT

Counsel, pursuant to Rule 25910(1) of the Federal Rules of Civil Procedure, moves this Court for an order amending the Complaint.

1. Plaintiff seeks leave to file the attached Second Amended Master Short Form Complaint for Damages for Individual Claims and Demand for Jury Trial to correct Paragraph 10 to read “X G2® Vena Cava Filter” instead of being blank (see Second Amended Master Short Form Complaint for Damages for Individual Claims and Demand for Jury Trial).

2. Plaintiff’s counsel has conferred with Defendants’ counsel and Defendants do not oppose the filing of this motion.

Based on the foregoing, Carrie Kelley requests that this Court grant this request to correct Paragraph 10 to read “X G2® Vena Cava Filter,” and for leave to file the Second Amended Master Short Form Complaint for Damages for Individual Claims and Demand for Jury Trial, and direct the Clerk to file the attached Second Amended Master Short Form Complaint for Damages for Individual Claims and Demand for Jury Trial.

Dated: July 10, 2017

/s/ Joseph R. Johnson
Joseph R. Johnson, Bar No: 372250
Babbitt & Johnson, P.A.
1641 Worthington Road
Suite 100
West Palm Beach, FL 33402-4426
Telephone: (561) 684-2500
Facsimile: (561) 684-6308
jjohnson@babbitt-johnson.com

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of July, 2017, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

/s/ Joseph R. Johnson